

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

In Re: Darnell Anthony Price

Case No. 20-10964-KHK  
Chapter 13

**NOTICE OF OBJECTION TO DEBTOR'S CHAPTER 13 PLAN AND HEARING  
THEREON**

**Real Property at 3640 Briarwood Drive, Dumfries, Virginia 22026**

Caliber Home Loans, Inc. herein, has filed papers with the court objecting to debtor's chapter 13 plan. Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

The hearing is scheduled for **June 11, 2020 at 1:30 p.m.** at Judge Kindred's Courtroom, 200 S. Washington Street, 3rd Floor, Courtroom III, Alexandria, VA 22314.

/s/ Abby K. Moynihan, Esq.  
Abby K. Moynihan, Esq.  
Attorney for Secured Creditor  
Bar No. 79686  
McCabe, Weisberg & Conway, LLC  
312 Marshall Avenue, Suite 800  
Laurel, MD 20707  
301-490-1196  
bankruptcyva@mwc-law.com

**CERTIFICATE OF SERVICE**

I hereby certify that on April 16, 2020 I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing pleading will be served electronically by the Court's CM/ECF system on the following:

**Martin C. Conway**

Conway Law Group, PC  
12934 Harbor Drive  
Suite 107  
Woodbridge, VA 22192

**Thomas P. Gorman**

300 N. Washington St. Ste. 400  
Alexandria, VA 22314

**John P. Fitzgerald, III**

Office of the U.S. Trustee - Region 4  
1725 Duke Street  
Suite 650  
Alexandria, VA 22314

I hereby further certify that on April 16, 2020, a copy of the foregoing pleading was also mailed  
first class mail, postage prepaid to:

**Darnell Anthony Price**

3640 Briarwood Drive  
Dumfries, VA 22026  
(Via U.S Mail)

/s/ Abby K. Moynihan, Esq.  
Abby K. Moynihan, Esq.

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**OBJECTION BY SECURED CREDITOR TO PROPOSED PLAN**

Comes now the secured creditor, Caliber Home Loans, Inc., which holds a Deed of Trust secured by the Debtor's real property at 3640 Briarwood Drive, Dumfries, Virginia 22026, by and through its attorney, Abby K. Moynihan, Esq., and objects to the proposed plan and to confirmation and for reason therefore states as follows:

1. The Debtor has proposed a plan which includes a total payment of \$7,635.00 for arrearages owed to Caliber Home Loans, Inc.
2. The secured creditor Caliber Home Loans, Inc. anticipates filing a Proof of Claim with pre-petition arrearages due in the approximate amount of \$14,396.94.
3. The plan as proposed by the Debtor would therefore be insufficient to pay the claim of Caliber Home Loans, Inc.

Wherefore the Secured Creditor prays this court to enter an Order

1. Denying confirmation of the proposed Chapter 13 Plan, or alternatively
2. Modifying the Chapter 13 Plan to provide for payment in full of the Claim filed by the secured creditor, or alternatively
3. For such other and further relief as the Court deems appropriate.

Respectfully submitted:

/s/ Abby K. Moynihan, Esq.  
Abby K. Moynihan, Esq.  
Attorney for Secured Creditor  
Bar No. 79686  
McCabe, Weisberg & Conway, LLC  
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/s/ Abby K. Moynihan, Esq.  
Abby K. Moynihan, Esq.